## MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal	Plaintiffs' Executive Committee for
Injury and Death Claims	Commercial Claims
Ronald L. Motley (1944-2013)	Stephen A. Cozen, Co-Chair
Jodi Westbrook Flowers, Co-Chair	Sean P. Carter, Co-Chair
Donald A. Migliori, Co-Chair	J. Scott Tarbutton, Liaison Counsel
Robert T. Haefele, Liaison Counsel	Cozen O'Connor
MOTLEY RICE LLC	

**VIA ECF** 

July 29, 2024

The Honorable George B. Daniels Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1310 New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committees and Ashton Plaintiffs (collectively "Plaintiffs") write in response to the submission by Saudi Arabia at ECF No. 10169. Saudi Arabia uses its letter to argue its attorneys' dubious and unsupported interpretations of Omar Al Bayoumi's actions in filming his casing video of the U.S. Capitol. Those arguments only serve to underscore the degree to which Saudi Arabia's motion rests on misguided efforts to argue its preferred views of the evidence, contrary to the governing standards. See ECF No. 9539 at 10-11. Rather than answer Saudi Arabia's arguments point-by-point now, Plaintiffs will address them properly at the oral argument before this Court this Wednesday, July 31, 2024.

Respectfully submitted,

MOTLEY RICE LLC

By: <u>/s/ Robert T. Haefele</u>
ROBERT T. HAEFELE
MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel.: (843) 216-9184

Email: rhaefele@motleyrice.com

Liaison Counsel for the Plaintiffs' Executive Committee for Personal Injury and Death Claims on behalf of the Plaintiffs COZEN O'CONNOR

By: /s/ Sean P. Carter
SEAN P. CARTER
STEPHEN A. COZEN
J. SCOTT TARBUTTON
COZEN O'CONNOR
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105

Tel.: (215) 665-2105 Email: scarter@cozen.com

Co-Chair of the Plaintiffs' Executive Committee for Commercial Claims on behalf of Plaintiffs

The Honorable George B. Daniels, U.S.D.J. July 29, 2024 Page 2

## KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian STEVEN R. POUNIAN JAMES GAVIN SIMPSON 485 Lexington Avenue New York, New York 10017

Tel.: 212-687-8181

Email: spounian@kreindler.com

Attorneys for Ashton Plaintiffs

cc: The Honorable Sarah Netburn, via ECF All Counsel of Record via ECF